

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA,

Plaintiff,

V.

BRYANSTON GROUP INC. et al.,  
Defendants.

Case No.: 1:08-cv-04806 (LAP)

**MOTION TO ADMIT GERALD A.  
FEFFER *PRO HAC VICE***

X

Pursuant to Local Civil Rule 1.3(c), undersigned counsel respectfully moves for the admission *pro hac vice* of the following attorney in the above-captioned matter:

**Gerald A. Feffer**  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, DC 20005  
Tel: (202) 434-5000  
Fax: (202) 434-5029

Mr. Feffer is a member in good standing of the Bar of the District of Columbia and the Bar of the State of New York. There are no pending disciplinary proceedings against Mr. Feffer in any State or Federal Court. This Motion is based on the accompanying Affidavit of Stuart E. Abrams and Certificates of Good Standing from the District of Columbia Bar and the New York Bar. A proposed Order is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams  
Frankel & Abrams  
230 Park Avenue, Suite 660  
New York, New York 10169-0005  
(212)661-5000

*Counsel for Claimant Beatrice Tollman*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA,

Plaintiff,

V.

BRYANSTON GROUP INC. et al.,

**Defendants.**

⋮

Case No.: 1:08-cv-04806 (LAP)

**DECLARATION OF STUART E.  
ABRAMS IN SUPPORT OF  
MOTION TO ADMIT GERALD A.  
FEFFER PRO HAC VICE**

X

I, STUART E. ABRAMS, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby declare the following to be true under the penalties of perjury, pursuant to 28 U.S.C. § 1746:

1. I am a partner at Frankel & Abrams and counsel for Claimant Beatrice Tollman in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth here and in support of the motion to admit Gerald A. Feffer as counsel pro hac vice to represent Ms. Tollman in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1978. I am also a member in good standing of the bar of this Court, admitted in 1978.

3. I have known Mr. Feffer since 1976.

4. Mr. Feffer is a partner at Williams & Connolly, in Washington, DC.

5. I have found Mr. Feffer to be a skilled attorney and person of the highest integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Mr. Feffer is a member in good standing of the bar of the District of Columbia and the bar of the State of New York. In connection with this motion, I am submitting Certificates of Good Standing issued by these bars. I am aware of no pending disciplinary proceedings against Mr. Feffer in any state or federal court.

7. For the foregoing reasons, I respectfully move the *pro hac vice* admission of Gerald A. Feffer in the above-captioned matter. For the Court's convenience, a proposed order granting this motion is attached hereto.

Dated: July 25, 2008

FRANKEL & ABRAMS

By: 

Stuart E. Abrams

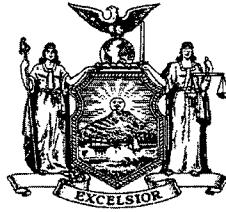
Frankel & Abrams

230 Park Avenue, Suite 660

New York, New York 10169-0005

(212)661-5000

*Counsel for Claimant Beatrice Tollman*



**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

---

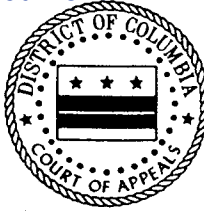
**I, James Edward Pelzer, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that Gerald A. Jeffer was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 19<sup>th</sup> day of June 1968, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.**

**In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on July 15, 2008.**



*James Edward Pelzer*

**Clerk of the Court**



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

GERALD A. FEFFER

---

was on the 23<sup>RD</sup> day of OCTOBER, 1980

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 23, 2008.

GARLAND PINKSTON, JR., CLERK

By: N. Charles  
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X

UNITED STATES OF AMERICA,

Plaintiff,

V.

BRYANSTON GROUP INC. et al.,  
Defendants.

• • • • •

Case No.: 1:08-cv-04806 (LAP)

**[PROPOSED] ORDER FOR  
ADMISSION OF GERALD A.  
FEFFER PRO HAC VICE**

X

This matter having been brought before the Court by motion pursuant to Local Civil Rule 1.3(c) for the admission *pro hac vice* of Gerald A. Feffer, Esq., in the above-captioned matter, it is this \_\_\_\_ day of \_\_\_\_\_ 2008, hereby

ORDERED that the motion is GRANTED, and

IT IS FURTHER ORDERED THAT Gerald A. Feffer shall be admitted *pro hac vice* in the above-captioned matter. Counsel shall remit the required \$25 fee to the Cashier's Office for this *pro hac vice* admission.

Dated:

HON. LORETTA A. PRESKA, U.S.D.J.